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*Attorneys for*  
*Defendant Binance Capital Management Co., Ltd.*

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

Ryan Cox, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

CoinMarketCap OpCo, LLC; Binance  
Capital Management Co., Ltd. d/b/a Binance  
and Binance.com; BAM Trading Services  
Inc. d/b/a Binance.US; Changpeng Zhao;  
Catherine Coley; Yi He; Ted Lin; and Does  
I-X;

Defendants.

Case No. 21-cv-08197-PCT-SMB

**DEFENDANT BINANCE  
CAPITAL MANAGEMENT CO.,  
LTD.'s RESPONSE TO  
PLAINTIFF'S MOTION FOR  
RECONSIDERATION**

Pursuant to the Court's Order dated January 11, 2022 (ECF No. 39), Binance Capital Management Co., Ltd. ("Binance"), by and through undersigned counsel, acknowledges that it has been served and does not oppose Plaintiff's motion for reconsideration. As set forth in the Joint Stipulation dated November 3, 2021 (ECF No. 16), which was so ordered by this Court on November 5, 2021 (ECF No. 17), Binance reserves all rights and defenses, including, without limitation, any and all jurisdictional,

1 venue, or forum-related rights and defenses. Binance anticipates filing a motion to  
2 dismiss pursuant to Fed. R. Civ. P. 12(b) within sixty (60) days of service of all  
3 Defendants, but to its knowledge, not all individual Defendants have been served.

4 RESPECTFULLY SUBMITTED this 18th day of January 2022.

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8  
9 By: 

10 Andrea S. Tazioli (#026621)  
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12 *Capital Management Co., Ltd.*

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17 By: /s/ Roberto Gonzalez (with  
18 permission)

19 Roberto J. Gonzalez (*pro hac vice*  
20 *forthcoming*)  
21 *Attorneys for Defendant Binance*  
22 *Capital Management Co., Ltd.*  
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**CERTIFICATE OF SERVICE**

I certify that on the 18th day of January 2022, I electronically transmitted the foregoing document to the Office of the Clerk of the Court, using the CM/EFC System, for filing and for transmittal of a Notice of Electronic Filing to the CM/EFC registrants on record.

/s/ Sarah Flaaen